

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

	:	Master File No. 10-CV-00990-SLR
	:	
IN RE WILMINGTON TRUST	:	(Securities Class Action)
SECURITIES LITIGATION	:	
	:	Hon. Sue L. Robinson
	:	
This Document Relates to: ALL ACTIONS	:	ELECTRONICALLY FILED
	:	
	:	Oral Argument Requested

**SCHEDULING STIPULATION AND PROPOSED ORDER GOVERNING  
MOTIONS TO DISMISS SECOND AMENDED COMPLAINT**

WHEREAS, on March 29, 2012, the Court granted Defendants' motions to dismiss the Consolidated Amended Complaint with leave to replead;

WHEREAS, on May 10, 2012, Lead Plaintiffs filed their Second Amended Consolidated Securities Class Action Complaint (the "SAC");

WHEREAS, by the Stipulation And [Proposed] Order Extending Time To File Amended Complaint And To Respond To Amended Complaint, dated March 27, 2012, the parties agreed that "the parties expect to negotiate and submit a further scheduling stipulation after the amended complaint is filed and mediation, if any, is scheduled . . . ;"

WHEREAS, certain of the parties have engaged in mediation in an effort to resolve this matter;

WHEREAS, the mediation has not yet been successful and the parties wish to enter into a schedule to govern proceedings with respect to Defendants' motions to dismiss the SAC;

WHEREAS, the parties have agreed, subject to the Court's approval, that the same page limitations should apply to Defendants' motions to dismiss the SAC as the Court had previously approved with respect to their motions to dismiss the Consolidated Amended Complaint, except

that the parties have further agreed, subject to the Court's approval, that the page limits for the opening briefs of the Underwriter Defendants (J.P. Morgan Securities LLC and Keefe, Bruyette & Woods, Inc.) and KPMG LLP in support of their respective motions to dismiss the SAC should be extended to 25 pages, and that the page limits for their respective reply briefs should be extended to 14 pages;

IT IS HEREBY STIPULATED, by and between Lead Plaintiffs and Defendants, subject to the approval of the Court, as follows:

1. Defendants shall file motions to dismiss the SAC, and opening briefs in support thereof, on or before July 27, 2012. The page limit for the opening brief of the Wilmington Trust Defendants is extended to 60 pages. The page limit for the opening briefs of the Underwriter Defendants and KPMG LLP is extended to 25 pages in each case.

2. Lead Plaintiffs shall file their answering brief in opposition to Defendants' motions to dismiss the SAC on or before September 21, 2012. The page limit for Lead Plaintiffs' omnibus answering brief is extended to 85 pages.

3. Defendants shall file their reply briefs in further support of their motions to dismiss the SAC on or before October 26, 2012. The page limit for the reply brief of the Wilmington Trust Defendants is extended to 20 pages. The page limit for the reply briefs of the Underwriter Defendants and KPMG LLP is extended to 14 pages in each case.

Respectfully submitted,

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IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2012.

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The Honorable Sue L. Robinson  
United States District Court Judge